

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Paradis Gas Processing Plant
TEXACO PIPELINES, LLC
Paradis, St. Charles Parish, Louisiana
Agency Interest Number: 40853
Activity Number: PER20050003
Draft Permit 2520-00031-V3

I. APPLICANT:

Company:

Texaco Pipelines, LLC
2811 Hayes Rd
Houston, TX 77082

Facility:

Paradis Gas Processing Plant
15849-A Old Spanish Trail in St. Charles Parish, Louisiana
Approximate UTM coordinates are 746.080 kilometers East and 3305.735 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Paradis Gas Processing Plant is an existing natural gas processing facility located in St. Charles Parish near Paradis, LA. Texaco Pipelines, LLC sold the fractionation portion of the Paradis Plant to Discovery Producer Services, LLC on June 1, 2002. Previously, the site operated under Permit No. 2520-00031-V1 dated July 31, 2001. Currently the facility operates under Permit No. 2520-00031-V2 dated August 3, 2004.

This is the Part 70 operating permit renewal for Paradis Gas Processing Plant.

There is one currently Part 70 application submitted to the Louisiana Department of Environmental Quality (LDEQ) undergoing the permit review process:

Permit No.	Units or Sources	Date Issued
2940-00234-V0	Henry Gas Separation Facility	Pending

**Paradis Gas Processing Plant
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III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

Texaco Pipelines LLC submitted an application and Emission Inventory Questionnaire (EIQ) dated November 8, 2005, requesting a Part 70 Permit renewal.

A notice requesting public comment on the permit was published in the *Advocate*, Baton Rouge, Louisiana, on XXX XX, 2006 and *The St Charles Herald-Guide*, St. Charles, Louisiana, on XXX XX, 2006. The public notice was sent to persons included in the Office of Environmental Services Public Notice Mailing List on XXX XX, 2006. The proposed permit was also submitted to US EPA Region VI. All comments will be considered prior to the final permit decision.

Project description

The Paradis Gas Processing Plant is a natural gas processing plant located in St. Charles Parish. In the past it has functioned as a traditional gas processing plant, in which natural gas from nearby production facilities entered the plant and was separated by a cryogenic unit into a residue natural gas stream and a mixed natural gas liquids stream. The liquids stream was then fractionated into propane, butanes, and natural gasoline. The fractionation unit also processed liquids from another gas processing facility, the Larose Gas Processing Plant. Residue gas was compressed for delivery to sales pipeline.

Texaco Pipelines has sold the natural gas liquids portion of the plant (the fractionator) to Discovery Producer Services, LLC. The cryogenic separator unit has been shut down. Texaco Pipelines will continue to own only the residue gas/inlet gas compression facilities at Paradis Plant, receiving residue gas from the Larose plant and/or raw natural gas and compressing the gas under Standard Industrial Classification (SIC) 4922, Natural Gas Transmission. Texaco is modifying their Title V permit to reflect this decrease in scope of their operations. Discovery Producer Services will obtain a new Title V permit to operate the fractionator under Standard Industrial Classification (SIC) 1321, Natural Gas Liquids.

The Texaco facility contains several fixed roof storage tanks for storing condensate and methanol. Other tanks at the site store materials such as lube oil, corrosion inhibitor, and diesel fuel. These tanks store liquids with very low vapor pressures and can be classified as insignificant sources per LAC 33:III.501.5.D. Piping components are source of fugitive emissions.

Permit 2520-00031-V2 removed the fractionation facilities from their responsibility and the deleted several emission points due to either permanent shutdown and/or removal. The deleted emissions points included four compressor engines, one turbine, three gas heaters, one salt bath heater, and three tanks (methanol and antifreeze). Under Permit 2520-00031-

**Paradis Gas Processing Plant
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V2, Texaco Pipelines sent excess gas from start-up, shutdown and maintenance (of the gas compressors and of the TENDS pumps and other piping it operates at the facility) to Emission Source 51-95 (Plant Flare) permitted in the Initial Part 70 Regular Permit (Permit No. 2520-00090-V0, under Discovery Producer Services, LLC).

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.06	0.06	—
SO ₂	3.14	3.14	—
NO _x	515.47	515.47	—
CO	174.21	174.21	—
VOC	76.19	76.19	—

Prevention of Significant Deterioration (PSD) Applicability and Non-attainment New Source Review (NNSR)

This application was reviewed for compliance with the Louisiana Preconstruction and Part 70 operating permit program. It was also reviewed for compliance with Louisiana Air Quality Regulations, NSPS, and NESHAP. Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) are not required.

MACT requirements

The facility is classified as a minor source of HAPs, therefore the MACT regulations are not currently applicable.

Air Modeling Analysis

Louisiana Toxic Air Pollutant (LTAP) dispersion modeling is performed for the applicable LTAP compounds with emissions above the Minimum Emission Rate. The screening modeling results predict the maximum ground level concentrations of toxic air pollutants are below the Ambient Air Standards (AAS).

Impact on air quality from the emissions of the proposed facility will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

General Condition XVII Activities

There are no General Condition XVII activities at this site.

**Paradis Gas Processing Plant
Texaco Pipelines LLC
Paradis, St. Charles Parish, Louisiana
Agency Interest Number: 40853; PER20050003
Draft Permit 2520-00031-V3**

Insignificant Activities

The insignificant activities associated with this permit are in Section VIII of the proposed permit.

IV. Regulatory Analysis

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

Wetlands

This permit does not include any impacted wetlands.

V. Permit Shields

Not applicable.

VI. Periodic Monitoring

All periodic monitoring is conducted in accordance with state and federal regulations. See the Specific Requirements Section of the proposed permit renewal/modification for monitoring requirements.

VII. Applicability and Exemptions of Selected Subject Items

See Permit.

VIII. Streamlined Requirements

None.

IX. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) - A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H₂S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year of NO_x or VOC for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.